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GOYKO KUBUROVICH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA-SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: CR 16-00373-EJD
)	
Plaintiff,)	DEFENDANT GOYKO KUBUROVICH'S
)	2 nd OPPOSED EX PARTE REQUEST FOR
vs.)	EXTENSION OF TIME TO SURRENDER.
)	[PROPOSED ORDER]
GOYKO KUBUROVICH)	
et al.,)	CURRENT SURRENDER DATE: 10-10-19
)	EXTENSION REQUESTED: 11-11-19.
)	
Defendants.)	

2nd EX-PARTE REQUEST FOR ORDER EXTENDING TIME TO SURRENDER:

Defendant, **GOYKO KUBUROVICH**, hereby submits this 2nd EX PARTE MOTION TO EXTEND THE DATE DEFENDANT IS REQUIRED TO SURRENDER TO THE BUREAU OF PRISONS to commence his sentence. **The United States of America has indicated they OPPOSE this request.**


The current date defendant is required to surrender being October 10, 2019, defendant asks that date be extended to November 11, 2019. **The reasons offered for said extension is to afford Mr. Kuburovich's appellate counsel sufficient time to complete his interview of his client prior to the client's incarceration where an interview of the Defendant would be more difficult and time consuming.** (See, Declaration of David Zarmi In Support of 2nd Ex Parte request for Extension of Time to Surrender).

1 Previously Defendant requested a 60-day extension of his surrender date which
2 was denied by the court. This 2nd request is instead for 30 days and for reasons unrelated
3 to Defendant's prior request.

4 **CONCLUSION**

5 Based on the foregoing reasons, Defendant respectfully request that he be given
6 until November 11, 2019 to surrender to Lompoc Federal Prison Camp.

7 DATED: September 17, 2019

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9 J. DAVID NICK,
10 ATTORNEY FOR DEFENDANT

11 **[PROPOSED] ORDER EXTENDING DATE TO SURRENDER**

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13 Good Cause having been shown by the defendant's ex parte application, the Court
14 grants the defendant an extension of time to surrender from the currently set date of
15 October 10, 2019 to November____, 2019.

16
17 So Ordered,

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19 _____
20 United States District Judge
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